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Attorneys for Defendants
MOHAMED NASSER and ASKANDAR ALI ALMAWORI

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

DARREN GILBERT,

Plaintiff,

VS.

PAUL OIL COMPANY, INC.; MOHAMED
NASSER dba SAM'S MINI MART;
ASKANDAR ALI ALMAWORI dba SAM'S
MINI MART;

Defendants.

Case No. 1:22-cv-00087-DAD-EPG

**STIPULATION AND ORDER CONTINUING
MANDATORY SCHEDULING
CONFERENCE AND JOINT SCHEDULING
REPORT DUE DATE BY 28 DAYS**

(ECF NO. 20)

Trial Date: None Set

IT IS HEREBY STIPULATED by and between Plaintiff DARREN GILBERT (“Plaintiff”) and Defendants PAUL OIL COMPANY, INC., MOHAMED NASSER (sued herein as “MOHAMED NASSER dba SAM’S MINI MART) and ASKANDAR ALI ALMAWORI (sued herein as “ASKANDAR ALI ALMAWORI dba SAM’S MINI MART”) (collectively “Defendants”) (Plaintiff

1 and Defendants are referred to collectively herein as the “Parties”), by and through their attorneys of
2 record, as follows:

The Court may enter an Order continuing the June 14, 2022 Joint Scheduling Report due date
and the June 21, 2022 Mandatory Scheduling Conference in this matter, as well as the last date for the
Parties to confer further regarding the matters to be addressed in the Joint Scheduling Report, by 28 days
or as soon thereafter as pleases the Court. A twenty-eight day continuance will result in the Joint
Scheduling Report being due July 12, 2022 and a 10:00 a.m. July 19, 2022 Mandatory Scheduling
Conference. This is the second continuance of the foregoing matters requested by the Parties, and is
requested in light of the Parties' continuing settlement efforts, as discussed below.

The Parties believe that good cause exists to enter into this Stipulation and for the Court to issue an Order continuing the aforementioned deadlines. Good cause exists for these continuances for the purpose of reducing fees and costs, as counsel are actively exploring settlement in this action and believe that the additional time to investigate this matter and engage in further settlement discussions, while minimizing attorney time expended on this case, that will be afforded by the requested continuances will facilitate, and increase the chances of, early settlement of this matter. The settlement discussions thus far have included the providing of a Certified Access Specialist (CASP) report regarding the subject premises to counsel for Plaintiff, which is in the process of being reviewed and analyzed in connection with a potential settlement. It is hoped that, as a result of the requested continuances and additional time to investigate and negotiate, a settlement as to all claims and all Parties will be reached in this matter.

DATED: 6/6/2022

MOORE LAW FIRM, P.C.

By: /s/ Tanya E. Moore
Tanya E. Moore, Esq.
Attorneys for Plaintiff
DARREN GILBERT

1 DATED: 6/6/2022

CUMMINS & WHITE, LLP

2 By: /s/ J. Thomas Gilbert
3 J. Thomas Gilbert, Esq.
4 Attorneys for Defendant
PAUL OIL COMPANY, INC.

5
6 DATED: 6/6/2022

THE KARLIN LAW FIRM LLP

7 By: /s/ Rex T. Reeves
8 Rex T. Reeves, Esq.
9 Attorneys for Defendants
MOHAMED NASSER and
ASKANDAR ALI ALMAWORI

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ORDER

Having reviewed the Parties' stipulation (ECF No. 20) and considering the same, and finding good cause to grant the Parties' request, IT IS ORDERED that the Parties' Joint Scheduling Report shall be due no later than July 12, 2022, and the Mandatory Scheduling Conference shall now be held at 10:00 a.m. on July 19, 2022, with the Parties conferring regarding the matters to be addressed in the Joint Scheduling Report no later than 20 days before the Mandatory Scheduling Conference.

IT IS SO ORDERED.

Dated: **June 6, 2022**

/S/ Eric P. Goss

UNITED STATES MAGISTRATE JUDGE